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1	Danielle Hultenius Moore (SBN 232480)		
2	E-Mail: dmoore@fisherphillips.com Aaron F. Olsen (SBN 224947)		
3	E-Mail: aolsen@fisherphillips.com Christopher M. Champine (SBN 323385)		
4	E-Mail: cchampine@fisherphillips.com FISHER & PHILLIPS LLP		
5	4747 Executive Drive, Suite 1000 San Diego, California 92121		
6	Telephone: (858) 597-9600 Facsimile: (858) 597-9601		
7	Attorneys for Defendant, INTERNATIONAL PAPER COMPANY		
8			
	UNITED STATES DISTRICT COURT		
9	CENTRAL DISTRICT OF CALIFORNIA – WESTERN DIVISION		
10	TRAVONNE BORDERS, an individual,	Case No. Previously known as Los Angeles	
11	Plaintiff,	Superior Court Case No. 22STCV15935	
12	V.	DECLARATION OF CHRISTOPHER M. CHAMPINE IN	
13	INTERNATIONAL PAPER	SUPPORT OF DEFENDANT'S NOTICE OF REMOVAL OF CIVIL	
14	COMPANY, a New York	ACTION FROM STATE COURT TO	
15	corporation; ANGIE DOE, an individual; and DOES 1 through 20,	FEDERAL COURT PURSUANT TO 28 U.S.C. §§ 1332, 1441, AND 1446	
16	inclusive,		
17	Defendants.	State Court Complaint Filed: 5-12-2022	
18	I, Christopher M. Champine, declare as follows:		
19	1. I am an attorney at law, licensed to practice in the State of California		
20	and before this Court. I am an associate with Fisher & Phillips LLP, counsel of		
21	record for INTERNATIONAL PAPER COMPANY ("Defendant") in this case and		
22	make this Declaration in support of	of Defendant's Notice of Removal under	
23	28 U.S.C. §§ 1332, 1441, and 1446. All of the information set forth herein is based		
24	on my personal and first-hand knowledge except where indicated, and if called and		
25	sworn as a witness, I could and would testify competently thereto.		
26	2. On information and belief, on or about May 12, 2022, Plaintiff filed a		
27	Complaint in Los Angeles Superior Court. A true and correct copy of the Complaint		
28	is attached hereto as Exhibit A.		

- 3. On May 17, 2022, Plaintiff served a copy of the Summons and Complaint and related papers on International Paper Company's registered agent for service of process. True and correct copies of the Summons, Civil Case Cover Sheet, Notice of Case Assignment and Case Management Conference, and Proof of Service of Summons are attached as Exhibit B.
- 4. I have checked the Los Angeles Superior Court's docket for this action. As of the filing of this Notice of Removal and Removal, Defendant Angie DOE has not been served with Plaintiff's Complaint.
- 5. The Complaint (Exhibit A), Summons, Civil Case Cover Sheet, Notice of Case Assignment and Case Management Conference and Proof of Service of Summons (Exhibit B) are the only pleadings, process, or orders that have been served upon Defendant. or that Defendant is aware of having been filed in this action.
- 6. Written notice of Defendant's Notice of Removal and Removal in the United States District Court for the Central District of California will be served on Plaintiff's counsel of record. A copy of the Notice to Adverse Party of Removal of Action to Federal Court is attached to the Notice as Exhibit 1 (without exhibits because the Notice is the exhibit). In addition, a copy of this Notice of Removal and Removal will be filed with the Clerk of the Court in the Superior Court for the State of California, County of Los Angeles. A copy of the Notice to State Court of Removal of Action to Federal Court is attached to the Notice as Exhibit 2 (without exhibits because the Notice is the exhibit).

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on June 15, 2022, at San Diego, California.

Christopher M. Champine

Declarant

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1	CERTIFICATE OF SERVICE
2 3 4	I, the undersigned, am employed in the County of San Diego, State of California. I am over the age of 18 and not a party to the within action; am employed with the law offices of Fisher & Phillips LLP and my business address is 4747 Executive Drive, Suite 1000, San Diego, California 92121.
5 6 7	On the below date, I served the foregoing document entitled DECLARATION OF CHRISTOPHER M. CHAMPINE IN SUPPORT OF DEFENDANT'S NOTICE OF REMOVAL OF CIVIL ACTION FROM STATE COURT TO FEDERAL COURT PURSUANT TO 28 U.S.C. §§ 1332, 1441, AND 1446 on all the appearing and/or interested parties in this action with the original a true copy thereof addressed as follows:
8 9 0 1	Samvel Setyan (SBN 325831) SETYAN LAW, APC 750 E. Green Street, Suite 310 Pasadena, California 91101 Attorney for Plaintiff, Travonne Borders T: 213-618-3655 E: s.setyan@setyanlaw.com
1 2 3 4 5 6 7 8 9 20 21	□ [by ELECTRONIC SUBMISSION] - I served the above listed document(s) described via the United States District Court's Electronic Filing Program on the designated recipients via electronic transmission through the CM/ECF system on the Court's website. The Court's CM/ECF system will generate a Notice of Electronic Filing (NEF) to the filing party, the assigned judge, and any registered users in the case. The NEF will constitute service of the document(s). Registration as a CM/ECF user constitutes consent to electronic service through the court's transmission facilities. □ [by MAIL] - I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at San Diego, California in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postage cancellation date or postage meter date is more than one day after date of deposit for mailing this affidavit. Example
23 24	I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.
25	Executed June 15, 2022 at San Diego, California. Susan Jackson By:
27	Print Name Signature

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